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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re the Patent Application of

Steven R. Boal

Application No. **09/451,160**

Filed: November 30, 1999

For: ELECTRONIC COUPON DISTRIBUTION SYSTEM

Art Unit: **3622**

Examiner: J. Myhre

Confirmation No. 8692

SUPPLEMENTAL APPEAL BRIEF

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

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GROUP 3600

Sir:

This is a Supplemental Appeal Brief, submitted under 37 C.F.R. §§ 1.192 and 1.193(b)(2)(ii), requesting reinstatement of the Appeal in response to the rejection of the Examiner made within the non-final Office Action of December 24, 2003 (Paper No. 29) reopening prosecution of this case. Each of the topics required by Rule 192 is presented herewith and is labeled appropriately.

I. Real Party In Interest

Coupons, Inc. of Palo Alto, California ("Coupons") is the real party in interest of the present application.

An assignment of all rights in the present application to Xadvantage Corporation was executed by the inventor and recorded by the U.S. Patent and Trademark Office at **reel 010543, frame 0709**.

An assignment of all rights in the present application to COUPONS.COM, Inc. was executed by Xadvantage Corporation and recorded by the U.S. Patent and Trademark Office at **reel 010820, frame 0891**.

An assignment of all rights in the present application to Coupons was executed by COUPONS.COM, Inc. and recorded by the U.S. Patent and Trademark Office at **reel 012544, frame 0069.**

II. Related Appeals And Interferences

There are no appeals or interferences related to the present application of which Appellant is aware.

III. Status of Claims

Claims 1-25 were originally filed in this application.

By the amendment of July 18, 2002, claims 19-21 were canceled.

By the amendment of December 20, 2002, claims 26-46 were

added.

Within the Amendment After Final Rejection Under 37 C.F.R. § 1.116 submitted on March 19, 2003, claims 26, 28-31, 42, 44 and 46 were amended.

Accordingly, appellant hereby appeals the rejection of claims 1-18 and 22-46, which are presented in the Appendix.

IV. Status of Amendments

No amendments have been made subsequent to the non-final rejection of December 24, 2003.

V. Summary of the Invention

The present invention relates generally to a system and method for coupon distribution, and, more particularly, to an electronic coupon distribution system.

Figure 1 of the specification as originally filed depicts a system 10 that includes a client system 14. Device ID is depicted within figure 1 as USER ID 30. The user ID does not specifically identify the user personally, but rather, more accurately associates a physical machine defining client system 14 with user profile information obtained during registration (page 10, lines 9-12). Main server system 12 can correlate the provided user ID

30 with user information (page 10, lines 15-16).

Figure 4 of the specification as originally filed depicts step 107. Within that step, personal information such as the user's name, e-mail address, residence address, social security number, telephone number, and the like are not obtained (page 19, lines 34-36). The user ID does not specifically identify the user personally, but rather, more accurately associates a physical machine defining client system 14 with user profile information obtained during registration (page 10, lines 9-12).

Significantly, however, the user is not personally identified nor is it even possible (e.g., through the "hacking" of server system 12) to identify the user personally, as such information is not even collected from the user (page 10, lines 19-22).

Page 17, lines 21-28 of the specification provides that client application 28 disables access to the invoked URL/code. For example, moving the mouse arrow over the coupon/ad does not cause the URL to be displayed, nor is "right-button clicking" operative to allow capture of the URL. Accordingly, the specified URL (and code) is neither displayed nor available, and cannot be discovered by, for example, "right-clicking" on coupon

display 76, like conventional web-based e-coupon distribution
systems.

VI. Issues

The issues presented for consideration in this appeal are as
follows:

Whether the Examiner erred in rejecting claims 24 and 25
under 35 U.S.C. §102 as being allegedly being anticipated by
U.S. Patent 6,298,446, Schreiber et al. (Schreiber).

Whether the Examiner erred in rejecting claims 26, 28, 30-32
and 44 under 35 U.S.C. §102 as being allegedly being
anticipated by U.S. Patent 6,377,986, Philyaw et al.
(Philyaw).

Whether the Examiner erred in rejecting claims 1-18 and 22-
23 under 35 U.S.C. §103 as being allegedly being obvious
over Schreiber in view of Philyaw.

Whether the Examiner erred in rejecting claims 27, 29, 33-43
and 45-46 under 35 U.S.C. §103 as being allegedly being
obvious over Philyaw in view of Schreiber.

Whether the Examiner erred in rejecting claims 2 and 15-18

under 35 U.S.C. §103 as being allegedly being obvious over Schreiber in view of Philyaw, and in further view of U.S. Patent 6,385,591, Mankoff.

Whether the Examiner erred in rejecting claims 27, 40-43 and 45 under 35 U.S.C. §103 as being allegedly being obvious over Philyaw in view of Schreiber, and in further view of Mankoff.

These issues will be discussed hereinbelow.

VII.   Grouping of Claims

For purposes of the issues presented by this appeal:

Claims 1, 3-8, 11, 14-18, 22-23, 29, 33, 36 and 39-43 stand or fall together.

Claims 2, 27 stand or fall together.

Claims 9-10, 34-35 stand or fall together.

Claims 12-13, 37-38 stand or fall together.

Claims 24-25 stand or fall together.

Claims 26, 28, 30-32 stand or fall together.

Claim 44 stands or falls separately.

Claims 45-46 stand or fall together.

The arguments set forth in the following section provide

reasons why these groups are considered patentable, 37 C.F.R. §1.192 (c)(7).

VIII. Arguments

In the non-final Office Action of December 24, 2003:

The Examiner rejected claims 24 and 25 under 35 U.S.C. §102 as being allegedly being anticipated by Schreiber.

The Examiner rejected claims 26, 28, 30-32 and 44 under 35 U.S.C. §102 as being allegedly being anticipated by Philyaw.

The Examiner rejected claims 1-18 and 22-23 under 35 U.S.C. §103 as being allegedly being obvious over Schreiber in view of Philyaw.

The Examiner rejected claims 27, 29, 33-43 and 45-46 under 35 U.S.C. §103 as being allegedly being obvious over Philyaw in view of Schreiber.

The Examiner rejected claims 2 and 15-18 under 35 U.S.C. §103 as being allegedly being obvious over Schreiber in view of Philyaw, and in further view of Mankoff.

The Examiner rejected claims 27, 40-43 and 45 under 35

U.S.C. §103 as being allegedly being obvious over Philyaw in view of Schreiber, and in further view of Mankoff.

For at least the following reasons, Appellant submits that these rejections are both technically and legally unsound and should therefore be reversed.

General Matters

M.P.E.P. 707.07(f) states that "the importance of answering such arguments is illustrated by *In re Herrmann*, 261 F.2d 598, 120 USPQ 182 (CCPA 1958) where the applicant urged that the subject matter claimed produced new and useful results. The court noted that since applicant's statement of advantages was not questioned by the examiner or the Board of Appeals, it was constrained to accept the statement at face value and therefore found certain claims to be allowable. See also *In re Soni*, 54 F.3d 746, 751, 34 USPQ2d 1684, 1688 (Fed Cir. 1995) (Office failed to rebut applicant's argument)."

Anticipation

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Obviousness

"The Patent and Trademark Office (PTO) has the burden of showing a prima facie case of obviousness." *In re Bell*, 26 USPQ2d 1529, 1530 (Fed. Cir. 1993). "In determining the propriety of the Patent Office case for prima facie obviousness, it is necessary to ascertain whether the prior art teachings would appear to be sufficient to one of ordinary skill in the art to suggest making the proposed substitution or other modification." *In re Taborsky*, 183 USPQ 50, 55 (CCPA 1974). Moreover, *prima facie* obviousness of a claimed invention is established "only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references." *In re Fine*, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988).

THE EXAMINER ERRED IN REJECTING CLAIMS 24 AND 25 UNDER 35 U.S.C. §102 AS BEING ALLEGEDLY BEING ANTICIPATED BY SCHREIBER.

This rejection is traversed at least for the following reasons.

Claims 24-25

Independent claim 24 in its current form is as originally

filed.

Please note that *claim 24 had been **PREVIOUSLY ALLOWED** by the Examiner* within **the first non-final Office Action** of Paper No. 9, mailed on March 6, 2002 (**1st Office Action**), within **the first Final Office Action** of Paper No. 13, mailed on April 26, 2002 (**2nd Office Action**), and within **the second non-final Office Action** of Paper No. 16, mailed on August 27, 2002 (**3rd Office Action**), that withdrew the first Final Office Action of August 6, 2002.

But unlike the three previous Office Actions, **the third non-final Office Action** of Paper No. 18, mailed on November 18, 2002 (**4th Office Action**), includes a rejection of claim 24, *although no amendment has been made to that claim*. It was only after the filing of the Request for Reconsideration of September 26, 2002 as a potentially dispositive paper that a rejection of claim 24 had been made.

Second and third Final Office Actions were mailed subsequent to the third non-final Office Action of Paper No. 18. **The second Final Office Action** of Paper No. 23 was mailed on February 11, 2003 (**5th Office Action**). But after the filing of an Appeal Brief on March 19, 2003 that challenged the propriety of the rejections made within the second Final Office Action, **the third**

Final Office Action of Paper No. 27, mailed on July 31, 2003 (**6th Office Action**), *withdrew the second Final Office Action and reopened prosecution.*

A Supplemental Appeal Brief filed on October 29, 2003 requested reinstatement of the Appeal in response to the rejection of the Examiner made within the third Final Office Action. Thereafter, **the fourth non-final Office Action** of Paper No. 29, mailed on December 24, 2003 (**7th Office Action**), *withdrew the third Final Office Action and reopened prosecution.*

Although no substantial amendment to the claims has been made, please note that the non-final Office Action of December 24, 2003 is the **seventh Office Action** made within the above-identified application, resulting in costly prosecution delays.

Claim 24 is drawn to a method of secure electronic coupon distribution that includes the steps of associating a Uniform Resource Locator (URL) including a promotional code with a coupon; displaying the coupon to a user; disabling access to the URL by the user; and invoking the URL with a browser to thereby enable the user to redeem the coupon. Specifically, page 17, lines 21-28 of the specification provides that:

Client application 28 disables access to the invoked

URL/code. For example, moving the mouse arrow over the coupon/ad does not cause the URL to be displayed, nor is "right-button clicking" operative to allow capture of the URL. Accordingly, *the specified URL (and code) is neither displayed nor available*, and cannot be discovered by, for example, "right-clicking" on coupon display 76, like conventional web-based e-coupon distribution systems.

The Office Action contends that Schreiber teaches associating a Uniform Resource Locator (URL)(i.e. network address) with a coupon and cites column 6, lines 37-41 and column 32, line 65 to column 33, line 30 for this teaching.

In response to this contention, Schreiber, at column 32, line 64 to column 33, line 1, provides that "although the present invention has been described with respect to digital images, it applies to copyright protection of other forms of multi-media referenced in web pages as well, such as audio files, video files and slide shows."

Column 33, lines 7-9, of Schreiber further provides that "text contained in web pages can be copied by simply selecting a section of text by dragging a mouse pointer thereover, and invoking a "Copy" command."

Column 33, lines 16-18, of Schreiber provides that "the present invention can be integrated with transaction software so that protected images can be purchased on-line."

Column 14, lines 55-61 of Schreiber arguably teaches that some URL's do not correspond to existing web page files, but instead contain instructions, such as CGI script instructions or Visual Basic instructions, for generating dynamic web pages, such as active server pages. When a user opens such an URL, the server computer typically generates a web page dynamically, and sends the generated web page to the client computer.

Column 16, lines 6-9 of Schreiber arguably teaches that in response to a user selecting a URL with a CGI script or such other script, client computer 106 issues an HTTP request to server computer 100 that includes instructions for generating a web page.

Column 16, line 67 to column 17, line 3 of Schreiber arguably teaches that at step 606 the user opens a URL for an active server page in his web browser, or another such URL that includes a request for dynamically generating a web page.

Column 21, lines 6-7 of Schreiber arguably teaches that at step 1002 a user opens a URL for a web page in his web browser.

Yet, **associating a Uniform Resource Locator (URL) including
a promotional code with a coupon is not found within Schreiber.**
In this regard, a coupon is not found within Schreiber.

The Office Action contends that displaying the coupon to the
user is found within Schreiber. In response to this contention,
Schreiber is **silent** as to the presence of a coupon therein.

The Office Action contends that disabling access to the URL
by the user is found within Schreiber.

In response to this contention, column 25, lines 34-37 of
Schreiber arguably provides for *parameters that are disabled* so
that they cannot be edited. They indicate the DLL version of the
copyright protection software, the Netscape version and the
ActiveX version, respectively.

Also arguably described within Schreiber are the disablement
of the DELETE button (column 26, lines 46-47) and the disablement
of the REMOVE button (column 27, lines 18-25).

Schreiber arguably teaches that SafeMedia also includes
enhanced system control for preventing screen capture by
disabling a clipboard (Schreiber at column 2, lines 27-29).

Schreiber arguably teaches that that other prior art techniques for protecting digital images use Java applets within web browsers to disable the menu that pops up when a user right clicks on a displayed image within his web browser (column 2, lines 37-40).

Schreiber arguably teaches that the disablement of the user's ability to save an image being displayed and the non-enablement of the user to save image data (column 7, lines 19-21 and lines 58-60).

Column 6, lines 37-41 of Schreiber provides that "a reference to a graphic object specifies the network address of the computer containing the graphic object, such as an IP address, together with the directory path (relative to a prescribed root directory) and filename for the graphic object."

In spite of the above-noted teachings, the claimed feature of *disabling access to the URL by the user is not found within Schreiber*. Instead, the preferred embodiment of the Schreiber is drawn to a method for protecting digital images distributed over a network (column 3, lines 37-39), and is not drawn to the disablement of access to the URL.

The Office Action contends that invoking the URL with a browser to thereby enable the user to redeem the coupon is found within Schreiber.

In response to this contention, **Schreiber is silent regarding the redemption of a coupon**. Thus, Schreiber also fails to disclose, teach or suggest invoking the URL with a browser to thereby enable the user to redeem the coupon.

THE EXAMINER ERRED IN REJECTING CLAIMS 26, 28, 30-32 AND 44 UNDER 35 U.S.C. §102 AS BEING ALLEGEDLY BEING ANTICIPATED BY PHILYAW.

This rejection is traverse at least for the following reasons.

Claims 26, 28, 30-32

Claim 26 and the claims dependent thereon are drawn to a method of operating an electronic coupon distribution system comprising the steps of collecting device information from a device of a client system without obtaining information sufficient to specifically identify the user; associating a device ID with the device information at a main server system; selecting a coupon according to the device ID to thereby identify

the coupon appropriate for the user based on the device information; and, transmitting the selected coupon from the main server system to the client system.

The claims include the collection of device information from a device of a client system without obtaining information sufficient to specifically identify the user. This is supported within the specification as originally filed. For example, figure 4 of the specification as originally filed depicts step 107. Within that step, personal information such as the user's name, e-mail address, residence address, social security number, telephone number, and the like is not obtained (page 19, lines 34-36). The user ID does not specifically identify the user personally, but rather, more accurately associates a physical machine defining client system 14 with user profile information obtained during registration (page 10, lines 9-12). Significantly, however, the user is not personally identified nor is it even possible (e.g., through the "hacking" of server system 12) to identify the user personally, as such information is not even collected from the user (page 10, lines 19-22).

Philyaw arguably teaches a routing string indicative of a location of a database on a web associated with a product in commerce. In particular, Philyaw arguably teaches that to provide some incentive to the user to enter more information, the

original prompt in function block 1404 would have offers for such things as _coupons_, discounts, etc., if the user will enter additional information (column 12, lines 43-46). Philyaw arguably teaches that the different type of medium that can be utilized with the above embodiment are such things as advertisements, which are discussed hereinabove, contests, games, news programs, education, _coupon promotional programs_, demonstration media (demos), and photographs, all of which can be broadcast on a private site or a public site (column 15, lines 21-26).

Philyaw teaches that if selecting the entry of basic information, the program will flow to a function block 1408 wherein the user will enter basic information such as **_name and serial number_** and possibly an address (figure 14, column 12, lines 40-42). Thus, information sufficient to specifically identify a user is **REQUIRED** in Philyaw.

While Philyaw further describes a program flow from the decision block 1406 to a function block 1410 of figure 14 for the entry of information (column 12, lines 47-48), this information within Philyaw is described as "additional information" (column 12, line 46), and not basic information.

Philyaw further provides that the _user ID 1806_ is obtained

via the wand software running on the PC 302 and upon installation
or subsequent configuration may request that the user input
certain profile information which may be used to target that
particular user with products and services which identify with
that user profile (column 20, lines 56-61). The Office Action
cites column 19, lines 11-60 of Philyaw for the feature of
collecting device information about a client device. But note
that the cited passage <u>clearly</u> indicates that ***the user ID 1806
identifies a user*** (column 19, lines 34-35).

Information sufficient to specifically identify a user is
REQUIRED in Philyaw. Thus, Philyaw fails to disclose, teach or
suggest collecting device information from a device of a client
system ***without obtaining information sufficient to specifically
identify the user***.

Claim 44

Claim 44 and the claims dependent thereon are drawn to a
coupon distribution system, comprising: means for collecting
device information from a user of a remote client system
indicative of one or more demographic characteristics of the user
without obtaining information sufficient to specifically identify
the user; means for associating a device ID with the device
information at a main server system; means for selecting coupons

according to the device ID to thereby identify coupons
appropriate for the user based on the user's demographic
characteristics; and, means for transmitting the selected coupons
from the server system to the client system.

Claim 44 and the claims dependent thereon include the
collection of device information from a device of a client system
without obtaining information sufficient to specifically identify
the user. This is supported within the specification as
originally filed. For example, figure 4 of the specification as
originally filed depicts step 107. Within that step, personal
information such as the user's name, e-mail address, residence
address, social security number, telephone number, and the like
is not obtained (page 19, lines 34-36). The user ID does not
specifically identify the user personally, but rather, more
accurately associates a physical machine defining client system
14 with user profile information obtained during registration
(page 10, lines 9-12). Significantly, however, the user is not
personally identified nor is it even possible (e.g., through the
"hacking" of server system 12) to identify the user personally,
as such information is not even collected from the user (page 10,
lines 19-22).

Philyaw arguably teaches a routing string indicative of a
location of a database on a web associated with a product in

commerce.   In particular, Philyaw arguably teaches that to

provide some incentive to the user to enter more information, the

original prompt in function block 1404 would have offers for such

things as _coupons_, discounts, etc., if the user will enter

additional information (column 12, lines 43-46).   Philyaw

arguably teaches that the different type of medium that can be

utilized with the above embodiment are such things as

advertisements, which are discussed hereinabove, contests, games,

news programs, education, _coupon promotional programs_,

demonstration media (demos), and photographs, all of which can be

broadcast on a private site or a public site (column 15, lines

21-26).

Philyaw teaches that if selecting the entry of basic

information, the program will flow to a function block 1408

wherein the user will enter basic information such as **_name and_**

serial number and possibly an address (figure 14, column 12,

lines 40-42).   Thus, information sufficient to specifically

identify a user is **REQUIRED** in Philyaw.

While Philyaw further describes a program flow from the

decision block 1406 to a function block 1410 of figure 14 for the

entry of information (column 12, lines 47-48), this information

within Philyaw is described as "additional information" (column

12, line 46), and not basic information.

Philyaw further provides that the _user ID 1806_ is obtained via the wand software running on the PC 302 and upon installation or subsequent configuration may request that the user input certain profile information which may be used to target that _particular user_ with products and services which identify with that user profile (column 20, lines 56-61). The Office Action cites column 19, lines 11-60 of Philyaw for the feature of collecting device information about a client device. But note that the cited passage <u>clearly</u> indicates that **_the user ID 1806 identifies a user_** (column 19, lines 34-35).

Information sufficient to specifically identify a user is **REQUIRED** in Philyaw. Thus, Philyaw fails to disclose, teach or suggest collecting device information from a device of a client system **_without obtaining information sufficient to specifically identify the user_**.

**THE EXAMINER ERRED IN REJECTING CLAIMS 1-18 AND 22-23 UNDER 35 U.S.C. §103 AS BEING ALLEGEDLY BEING OBVIOUS OVER SCHREIBER IN VIEW OF PHILYAW; and**

**THE EXAMINER ERRED IN REJECTING CLAIMS 27, 29, 33-43 AND 45-46 UNDER 35 U.S.C. §103 AS BEING ALLEGEDLY BEING OBVIOUS OVER**

PHILYAW IN VIEW OF SCHREIBER; and

THE EXAMINER ERRED IN REJECTING CLAIMS 2 AND 15-18 UNDER 35 U.S.C. §103 AS BEING ALLEGEDLY BEING OBVIOUS OVER SCHREIBER IN VIEW OF PHILYAW, AND IN FURTHER VIEW OF MANKOFF; and

THE EXAMINER ERRED IN REJECTING CLAIMS 27, 40-43 AND 45 UNDER 35 U.S.C. §103 AS BEING ALLEGEDLY BEING OBVIOUS OVER PHILYAW IN VIEW OF SCHREIBER, AND IN FURTHER VIEW OF MANKOFF.

These rejections are traverse at least for the following reasons.

<u>Claims 1, 3-8, 11, 14-18, 22-23, 29, 33, 36 and 39-43</u>

Claims 1, 3-8, 11, 14-18, 22-23, 29, 33, 36 and 39-43 include the steps of:

collecting device information from a device of a client system without obtaining information sufficient to specifically identify the user;

associating a device ID with the device information at a main server system;

selecting said coupon according to the device ID to thereby

identify the coupon appropriate for said user based on the device information; and,

transmitting the selected coupon from the main server system to the client system.

The claims include the collection of device information from a device of a client system without obtaining information sufficient to specifically identify the user. This is supported within the specification as originally filed. For example, figure 4 of the specification as originally filed depicts step 107. Within that step, personal information such as the user's name, e-mail address, residence address, social security number, telephone number, and the like is not obtained (page 19, lines 34-36). The user ID does not specifically identify the user personally, but rather, more accurately associates a physical machine defining client system 14 with user profile information obtained during registration (page 10, lines 9-12). Significantly, however, the user is not personally identified nor is it even possible (e.g., through the "hacking" of server system 12) to identify the user personally, as such information is not even collected from the user (page 10, lines 19-22).

Philyaw arguably teaches a routing string indicative of a location of a database on a web associated with a product in

commerce. In particular, Philyaw arguably teaches that to provide some incentive to the user to enter more information, the original prompt in function block 1404 would have offers for such things as _coupons_, discounts, etc., if the user will enter additional information (column 12, lines 43-46). Philyaw arguably teaches that the different type of medium that can be utilized with the above embodiment are such things as advertisements, which are discussed hereinabove, contests, games, news programs, education, _coupon promotional programs_, demonstration media (demos), and photographs, all of which can be broadcast on a private site or a public site (column 15, lines 21-26).

Philyaw teaches that if selecting the entry of basic information, the program will flow to a function block 1408 wherein the user will enter basic information such as **_name and serial number_** and possibly an address (figure 14, column 12, lines 40-42). Thus, information sufficient to specifically identify a user is REQUIRED in Philyaw.

While Philyaw further describes a program flow from the decision block 1406 to a function block 1410 of figure 14 for the entry of information (column 12, lines 47-48), this information within Philyaw is described as "additional information" (column 12, line 46), and not basic information.

Philyaw further provides that the *user ID 1806* is obtained via the wand software running on the PC 302 and upon installation or subsequent configuration may request that the user input certain profile information which may be used to target that *particular user* with products and services which identify with that user profile (column 20, lines 56-61). The Office Action cites column 19, lines 11-60 of Philyaw for the feature of collecting device information about a client device. But note that the cited passage <u>clearly</u> indicates that ***the user ID 1806 identifies a user*** (column 19, lines 34-35).

Information sufficient to specifically identify a user is **REQUIRED** in Philyaw. Thus, Philyaw fails to disclose, teach or suggest collecting device information from a device of a client system ***without obtaining information sufficient to specifically identify the user***.

<u>Regarding Uniform Resource Locators</u> ("URL") Philyaw arguably teaches that documents, images, downloadable files, services, electronic mailboxes, and other resources found within Schreiber **are not URLs.** Instead, URLs are short strings of data that *identify resources on the Internet*: documents, images, downloadable files, services, electronic mailboxes, and other resources (Philyaw at column 1, lines 48-50). Multimedia

communications may use the Hypertext Transfer Protocol ("HTTP"), and files or formatted data may use the Hypertext Markup Language ("HTML") (Philyaw at column 4, lines 40-43). This formatting language provides for a mingling of text, graphics, sound, video, and hypertext links by "tagging" a text document using HTML (Philyaw at column 4, lines 43-45). Data encoded using HTML is often referred to as an "HTML document," an "HTML page," or a "home page" (Philyaw at column 4, lines 45-47). _These documents and other Internet resources may be accessed across the network by means of a network addressing scheme which uses a **locator referred to as a Uniform Resource Locator ("URL")**_, for example, "http://www.digital.com" (Philyaw at column 4, lines 47-51).

The Office Action contends that Schreiber teaches associating a Uniform Resource Locator (URL)(i.e. network address) with a coupon and cites column 6, lines 37-41 and column 32, line 65 to column 33, line 30 for this teaching.

In response to this contention, Schreiber, at column 32, line 64 to column 33, line 1, provides that "although the present invention has been described with respect to digital images, it applies to copyright protection of other forms of multi-media referenced in web pages as well, such as audio files, video files and slide shows."

Column 33, lines 7-9, of Schreiber further provides that "text contained in web pages can be copied by simply selecting a section of text by dragging a mouse pointer thereover, and invoking a "Copy" command."

Column 33, lines 16-18, of Schreiber provides that "the present invention can be integrated with transaction software so that protected images can be purchased on-line.".

Column 14, lines 55-61 of Schreiber arguably teaches that some URL's do not correspond to existing web page files, but instead contain instructions, such as CGI script instructions or Visual Basic instructions, for generating dynamic web pages, such as active server pages. When a user opens such an URL, the server computer typically generates a web page dynamically, and sends the generated web page to the client computer.

Column 16, lines 6-9 of Schreiber arguably teaches that in response to a user selecting a URL with a CGI script or such other script, client computer 106 issues an HTTP request to server computer 100 that includes instructions for generating a web page.

Column 16, line 67 to column 17, line 3 of Schreiber arguably teaches that at step 606 the user opens a URL for an

active server page in his web browser, or another such URL that
includes a request for dynamically generating a web page.

Column 21, lines 6-7 of Schreiber arguably teaches that at
step 1002 a user opens a URL for a web page in his web browser.

Yet, **associating a Uniform Resource Locator (URL) including
a promotional code with a coupon is not found within Schreiber.**
In this regard, a coupon is not found within Schreiber.

The Office Action contends that displaying the coupon to the
user is found within Schreiber. In response to this contention,
Schreiber is **silent** as to the presence of a coupon therein.

The Office Action contends that disabling access to the URL
by the user is found within Schreiber.

In response to this contention, column 25, lines 34-37 of
Schreiber arguably provides for *parameters that are disabled* so
that they cannot be edited. They indicate the DLL version of the
copyright protection software, the Netscape version and the
ActiveX version, respectively.

Also arguably described within Schreiber are the disablement
of the DELETE button (column 26, lines 46-47) and the disablement

of the REMOVE button (column 27, lines 18-25).

Schreiber arguably teaches that SafeMedia also includes enhanced system control for preventing screen capture by disabling a clipboard (Schreiber at column 2, lines 27-29).

Schreiber arguably teaches that that other prior art techniques for protecting digital images use Java applets within web browsers to disable the menu that pops up when a user right clicks on a displayed image within his web browser (column 2, lines 37-40).

Schreiber arguably teaches that the disablement of the user's ability to save an image being displayed and the non-enablement of the user to save image data (column 7, lines 19-21 and lines 58-60).

Column 6, lines 37-41 of Schreiber provides that "a reference to a graphic object specifies the network address of the computer containing the graphic object, such as an IP address, together with the directory path (relative to a prescribed root directory) and filename for the graphic object."

In spite of the above-noted teachings, the claimed feature of *__disabling access to the URL by the user is not found within__*

**Schreiber**. Instead, the preferred embodiment of the Schreiber is drawn to a method for protecting <u>digital images</u> distributed over a network (column 3, lines 37-39), and is <u>not drawn to the disablement of access to the URL</u>.

The Office Action contends that invoking the URL with a browser to thereby enable the user to redeem the coupon is found within Schreiber.

In response to this contention, **Schreiber is silent regarding the redemption of a coupon**. Thus, Schreiber also fails to disclose, teach or suggest invoking the URL with a browser to thereby enable the user to redeem the coupon.

<u>Claims 2, 27</u>

In addition to the reasons provided with respect to claims 1 and 26, these claims are traversed at least for the following reasons.

Within the claims, said collecting step comprises the substep of obtaining from the remote user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

The Office Action admits that neither Schreiber or Philyaw explicitly disclose obtaining demographic information including a postal zip code, and cites Mankoff for the features admittedly deficient within Schreiber and Philyaw.

Arguably, and at best, column 1, lines 28-35 of Mankoff teaches that it is known in the art to display product or service coupons on pages that are available through the Internet's World Wide Web information retrieval system. A user of a computer may access those pages through use of a conventional Web browser. The user navigates to a given page, which is then saved to a file or printed. The hard copy of the coupon may then be carried by the user directly to a retail location and used to receive a discount on a given purchase.

Mankoff arguably provides that an electronic or "virtual" coupon is obtained when a user selects a given link in a Web page being displayed on a client machine (column 1, lines 44-47).

Arguably, column 1, lines 50-58 of Mankoff teaches contact information associated with the coupon provider (e.g., address, web site URL, map and e-mail information) as automatically written to the PDA contact file.

Mankoff, at column 2, lines 61-65, arguably teaches that the

web server supports files (collectively referred to as a web site) in the form of hypertext documents and objects, and that a network path to a server is identified by a so-called Uniform Resource Locator (URL).

Mankoff, at column 5, lines 3-6, arguably teaches that the banner advertisement offers the consumer a free coupon for the product the consumer wants, preferably by clicking the banner.

Nevertheless, Mankoff is **silent** as to the presence of the zip code that is admittedly deficient within Schreiber and Philyaw. Thus, all features are not found within the cited prior art.

Also note that the use of Schreiber is inconsistent with Mankoff for the following reasons.

Whereas the virtual coupon of Mankoff *is saved to a file on a client machine* (Mankoff at column 1, lines 50-51), Schreiber conversely provides a method and system for <u>enabling a user to view protected image data using his web browser</u> *without being able to copy it* (Schreiber at column 3, lines 2-4).

In this regard, the invention Schreiber is distinct from Mankoff in several respects. A first distinction is that *the*

Schreiber arguably *displays an image to a user* **without**
downloading unmodified image data to the user's computer
(Schreiber at column 3, lines 8-10). A second distinction is that
Schreiber arguably prevents a user from copying a protected image
both from within and from without his web browser (Schreiber at
column 3, lines 15-17). But as noted hereinabove, the virtual
coupon of Mankoff is, conversely, **saved to a file on a client**
machine (Mankoff at column 1, lines 50-51).

Thus, the skilled artisan would not have applied Schreiber
for the features deficient within Mankoff.

Claims 9-10 and 34-35

In addition to the reasons provided with respect to claims 3
and 28, the rejection of these claims is traverse at least for
the following reasons.

Within claims 9 and 34, the remote client system operates in
accordance with an operating system characterized by a graphical
user interface (GUI). The method further including the steps of:

displaying an icon visible to the user in a first display
state; and,

displaying the icon in a second display state different from
the first display state when a new coupon is available for
the user.

The Office Action admits that Schreiber and Philyaw, either
individually or in combination, fail to disclose teach or suggest
that the graphical user interface on the client device uses icons
which may also flash to indicate the availability of new coupons.

But the Office Action take Official Notice, without
providing any objective evidentiary support, by asserting that
the use of icons, graphics, colors, animation, etc. to attract
the viewer's attention on graphical user interfaces is well known
in the computer arts, and their use would have been obvious to
one having ordinary skill in the art at the time the invention
was made, and that one would have been motivated to use icons,
flashing or otherwise, to notify the user of the Schreiber and
Philyaw systems in order to attract their attention more easily.

In response, this unsupported assertion amounts to nothing
more than conclusions that are personal in nature. Conversely,
the teachings, suggestions or incentives supporting the
obviousness-type rejection must be clear and particular. Broad
conclusory statements, standing alone, are not evidence. *In re
Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

As a rule, "assertions of technical facts in areas of esoteric technology must always be supported by citation to some reference work recognized as standard in the pertinent art and the appellant given, in the Patent Office, the opportunity to challenge the correctness of the assertion or the notoriety or repute of the cited reference." (Citations omitted). *In re Pardo and Landau*, 214 USPQ 673, 677 (CCPA 1982). The support must have existed at the time the claimed invention was made. *In re Merck & Co., Inc.*, 231 USPQ 375, 379 (Fed. Cir. 1986).

"Allegations concerning specific 'knowledge' of the prior art, which might be peculiar to a particular art should also be supported and the appellant similarly given the opportunity to make a challenge." (Citations omitted). *In re Pardo and Landau*, 214 USPQ 673, 677 (CCPA 1982).

In addition, "it is impermissible, however, simply to engage in a hindsight reconstruction of the claimed invention, using the applicant's structure as a template and selecting elements from references to fill the gaps. The references themselves must provide some teaching whereby the applicant's combination would have been obvious" (citations omitted). *In re Gorman*, 18 USPQ2d 1885, 1888 (Fed. Cir. 1991). See also *In re Dembiczak*, 50 USPQ2d 1614, 1616 (Fed. Cir. 1999)(rejection based upon hindsight is

reversed).

Moreover, the procedures established by Title 37 of the Code of Federal Regulations expressly entitle the Applicant to an Examiner's affidavit upon request. Specifically, "when a rejection in an application is based on facts within the personal knowledge of an employee of the Office, the data shall be as specific as possible, and the reference must be supported, when called for by the applicant, by the affidavit of such employee, and such affidavit shall be subject to contradiction or explanation by the affidavits of the applicant and other persons." 37 C.F.R. 1.104(d)(2).

Also note that the failure to provide any objective evidence to support the challenged use of Official Notice constitutes **clear and reversible error**. *Ex parte Natale*, 11 USPQ2d 1222, 1227-1228 (Bd. Pat. App. & Int. 1989).

Accordingly, **Applicant hereby requests a reference or an Examiner's affidavit** to support this officially noticed position of obviousness or what is well known. Further note that if this reference or Examiner's affidavit is not provided, the assertions of what is well known **must be withdrawn**. See M.P.E.P. §2144.03.

In addition, this assertion amounts to nothing more than an "obvious-to-try" situation. Specifically, "an 'obvious-to-try' situation exists when a general disclosure may pique the scientist's curiosity, such that further investigation might be done as a result of the disclosure, but the disclosure itself does not contain a sufficient teaching of how to obtain the desired result, or that the claimed result would be obtained if certain directions were pursued." *In re Eli Lilly & Co.*, 14 USPQ2d 1741, 1743 (Fed. Cir. 1990). Moreover, "an invention is 'obvious to try' where the prior art gives either no indication of which parameters are critical or no direction as to which of many possible choices is likely to be successful." *Merck & Co. Inc. v. Biocraft Laboratories Inc.*, 10 USPQ2d 1843, 1845 (Fed. Cir. 1989).

Here, Applicants related art do not contain a sufficient teaching of how to obtain the desired result, or that the claimed result would be obtained if certain directions were pursued. "Obvious to try" is not the standard under §103. *In re O'Farrell*, 7 USPQ2d 1673, 1680 (Fed. Cir. 1988).

Claims 12-13 and 37-38

In addition to the reasons provided with respect to claim 11, the rejection of these claims is traverse at least for the

following reasons.

Claims 12 and 37, and dependent claims 13 and 38 further include the steps of:

receiving the server-encrypted coupon data at the client system;

encrypting the server-encrypted coupon data in accordance with a client system encryption strategy to thereby generate doubly-encrypted coupon data; and,

storing the doubly-encrypted coupon data on the client system.

The Office Action admits that Schreiber and Philyaw, either individually or in combination, fail to disclose teach or suggest that the client system will also encrypt the coupon data upon receiving the data from the remote server.

But the Office Action take Official Notice, without providing any objective evidentiary support, by asserting that to encrypt data using a plurality of encryption methods in order to provide a higher level of security to the data would have been well-known to one of ordinary skill in the art.

In response, this unsupported assertion amounts to nothing
more than conclusions that are personal in nature. Conversely,
the teachings, suggestions or incentives supporting the
obviousness-type rejection must be clear and particular. Broad
conclusory statements, standing alone, are not evidence. *In re
Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

As a rule, "assertions of technical facts in areas of
esoteric technology must always be supported by citation to some
reference work recognized as standard in the pertinent art and
the appellant given, in the Patent Office, the opportunity to
challenge the correctness of the assertion or the notoriety or
repute of the cited reference." (Citations omitted). *In re Pardo
and Landau*, 214 USPQ 673, 677 (CCPA 1982). The support must have
existed at the time the claimed invention was made. *In re Merck &
Co., Inc.*, 231 USPQ 375, 379 (Fed. Cir. 1986).

"Allegations concerning specific 'knowledge' of the prior
art, which might be peculiar to a particular art should also be
supported and the appellant similarly given the opportunity to
make a challenge." (Citations omitted). *In re Pardo and Landau*,
214 USPQ 673, 677 (CCPA 1982).

In addition, "it is impermissible, however, simply to engage

in a hindsight reconstruction of the claimed invention, using the applicant's structure as a template and selecting elements from references to fill the gaps. The references themselves must provide some teaching whereby the applicant's combination would have been obvious" (citations omitted). *In re Gorman*, 18 USPQ2d 1885, 1888 (Fed. Cir. 1991). See also *In re Dembiczak*, 50 USPQ2d 1614, 1616 (Fed. Cir. 1999)(rejection based upon hindsight is reversed).

Moreover, the procedures established by Title 37 of the Code of Federal Regulations expressly entitle the Applicant to an Examiner's affidavit upon request. Specifically, "when a rejection in an application is based on facts within the personal knowledge of an employee of the Office, the data shall be as specific as possible, and the reference must be supported, when called for by the applicant, by the affidavit of such employee, and such affidavit shall be subject to contradiction or explanation by the affidavits of the applicant and other persons." 37 C.F.R. 1.104(d)(2).

Also note that the failure to provide any objective evidence to support the challenged use of Official Notice constitutes **clear and reversible error**. *Ex parte Natale*, 11 USPQ2d 1222, 1227-1228 (Bd. Pat. App. & Int. 1989).

Accordingly, **Applicant hereby requests a reference or an Examiner's affidavit** to support this officially noticed position of obviousness or what is well known. Further note that if this reference or Examiner's affidavit is not provided, the assertions of what is well known **must be withdrawn**. See M.P.E.P. §2144.03.

In addition, this assertion amounts to nothing more than an "obvious-to-try" situation. Specifically, "an 'obvious-to-try' situation exists when a general disclosure may pique the scientist's curiosity, such that further investigation might be done as a result of the disclosure, but the disclosure itself does not contain a sufficient teaching of how to obtain the desired result, or that the claimed result would be obtained if certain directions were pursued." *In re Eli Lilly & Co.*, 14 USPQ2d 1741, 1743 (Fed. Cir. 1990). Moreover, "an invention is 'obvious to try' where the prior art gives either no indication of which parameters are critical or no direction as to which of many possible choices is likely to be successful." *Merck & Co. Inc. v. Biocraft Laboratories Inc.*, 10 USPQ2d 1843, 1845 (Fed. Cir. 1989).

Here, Applicants related art do not contain a sufficient teaching of how to obtain the desired result, or that the claimed result would be obtained if certain directions were pursued.

"Obvious to try" is not the standard under §103. *In re O'Farrell*, 7 USPQ2d 1673, 1680 (Fed. Cir. 1988).

Claims 45-46

In addition to the reasons provided with respect to claim 44, these claims are traversed at least for the following reasons.

Within the claims 45-46, the collecting means includes means for obtaining from the remote user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

The Office Action admits that neither Schreiber or Philyaw explicitly disclose obtaining demographic information including a postal zip code, and cites Mankoff for the features admittedly deficient within Schreiber and Philyaw.

Arguably, and at best, column 1, lines 28-35 of Mankoff teaches that it is known in the art to display product or service coupons on pages that are available through the Internet's World Wide Web information retrieval system. A user of a computer may access those pages through use of a conventional Web browser. The user navigates to a given page, which is then saved to a file or

printed. The hard copy of the coupon may then be carried by the user directly to a retail location and used to receive a discount on a given purchase.

Mankoff arguably provides that an electronic or "virtual" coupon is obtained when a user selects a given link in a Web page being displayed on a client machine (column 1, lines 44-47).

Arguably, column 1, lines 50-58 of Mankoff teaches contact information associated with the coupon provider (e.g., address, web site URL, map and e-mail information) as automatically written to the PDA contact file.

Mankoff, at column 2, lines 61-65, arguably teaches that the web server supports files (collectively referred to as a web site) in the form of hypertext documents and objects, and that a network path to a server is identified by a so-called Uniform Resource Locator (URL).

Mankoff, at column 5, lines 3-6, arguably teaches that the banner advertisement offers the consumer a free coupon for the product the consumer wants, preferably by clicking the banner.

Nevertheless, Mankoff is **silent** as to the presence of the zip code that is admittedly deficient within Schreiber and

Philyaw. Thus, all features are not found within the cited prior art.

Also note that the use of Schreiber is inconsistent with Mankoff for the following reasons.

Whereas the virtual coupon of Mankoff **_is saved to a file on a client machine_** (Mankoff at column 1, lines 50-51), Schreiber conversely provides a method and system for <u>enabling a user to view protected image data using his web browser</u> **_without being able to copy it_** (Schreiber at column 3, lines 2-4).

In this regard, the invention Schreiber is distinct from Mankoff in several respects. A first distinction is that <u>_the Schreiber_</u> arguably <u>_displays an image to a user_</u> **_without downloading unmodified image data to the user's computer_** (Schreiber at column 3, lines 8-10). A second distinction is that Schreiber arguably prevents a user from copying a protected image both from within and from without his web browser (Schreiber at column 3, lines 15-17). But as noted hereinabove, the virtual coupon of Mankoff is, conversely, **_saved to a file on a client machine_** (Mankoff at column 1, lines 50-51).

Thus, the skilled artisan would not have applied Schreiber for the features deficient within Mankoff.
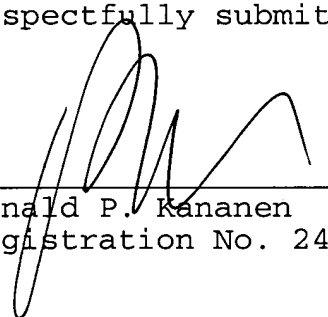
Conclusion

The cited prior art fails to disclose, teach or suggest all the features of claims 1-18 and 22-46. Thus, the claims are considered allowable for the reasons discussed above, as well as for the additional features they recite. In view of the above, the rejection of claims 1-18 and 22-46 is improper and should not be sustained.

Therefore, a reversal of the non-final rejection of December 24, 2003 as to claims 1-18 and 22-46 is respectfully requested.

Respectfully submitted,

DATE: February 4, 2004

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IX. APPENDIX

Claims on Appeal

1. The method of claim 24 further including the steps of:

collecting device information from a device of a client system without obtaining information sufficient to specifically identify the user;

associating a device ID with the device information at a main server system;

selecting said coupon according to the device ID to thereby identify the coupon appropriate for said user based on the device information; and,

transmitting the selected coupon from the main server system to the client system.

2. The method of claim 1 wherein said collecting step comprises the optional substep of:

obtaining from the remote user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

3. The method of claim 1 further including the step of:

associating the device ID with a remote client system.

4. The method of claim 3 further including the step of:

generating a printed version of one of the transmitted coupon at the remote client system.

5. The method of claim 3 further including the step of:

transmitting a request from the client system to the server system to perform said selecting step wherein the request includes the device ID.

6. The method of claim 5 wherein said request transmitting step includes the substep of:

automatically including the device ID in the request without any intervention by a remote user of the client system.

7. The method of claim 5 wherein said request transmitting step occurs automatically without any intervention by a remote user.

8. The method of claim 7 wherein said request transmitting step occurs at predetermined intervals.

9. The method of claim 3 wherein the remote client system operates in accordance with an operating system characterized by a graphical user interface (GUI), said method further including the steps of:

displaying an icon visible to the user in a first display state; and,

displaying the icon in a second display state different from the first display state when a new coupon is available for the user.

10. The method of claim 9 wherein the second display state is a flashing display state.

11. The method of claim 3 wherein said transmitting step includes the substeps of:

encrypting coupon data corresponding to the selected coupon at the server system in accordance with a server system encryption strategy; and,

sending the server-encrypted coupon data to the client system.

12. The method of claim 11 further including the step of:

receiving the server-encrypted coupon data at the client system;

encrypting the server-encrypted coupon data in accordance with a client system encryption strategy to thereby generate doubly-encrypted coupon data; and,

storing the doubly-encrypted coupon data on the client system.

13. The method of claim 12 further including the steps of:

decrypting the doubly-encrypted coupon data at the client system; and,

generating a printed version of one of the selected coupon at the remote client system.

14. The method of claim 3 further comprising the steps of:

transmitting advertising data to the client system; and,

displaying at least a portion of the transmitted advertising data on a display portion of the remote client system.

15. The method of claim 14 wherein the advertising data comprises a plurality of advertising impressions, and, wherein said displaying step comprises the substep of:

selecting one of the plurality of advertising impressions as a function of a selected subcategory of coupons available on the remote client system.

16. The method of claim 3 further comprising the steps of:

detecting events occurring at the remote client system;

storing the detected events in a user history file; and,

transmitting the user history file to the server system.

17. The method of claim 16 wherein said detecting step

includes the substeps of:

determining when one of a plurality of advertising impressions has been displayed on a display portion of the remote client system; and,

determining a sponsor identification of the advertising impression.

18. The method of claim 16 wherein the storing step comprises the substep of:

encrypting the detected events to thereby generate encrypted user event information; and,

writing the encrypted user event information to the client system.

22. The method of claim 24 further including the steps of:

collecting device information from a device on a network;

associating a device ID with the device information;

selecting said coupon according to the device ID;

encrypting coupon data corresponding to the selected coupon; and,

transmitting the encrypted coupon data from the main server system to the client system.

23. The method of claim 22 further including the step of:

decrypting the encrypted coupon data to recover the selected

coupon.

24. A method of secure electronic coupon distribution comprising the steps of:

associating a Uniform Resource Locator (URL) including a promotional code with a coupon;

displaying the coupon to a user;

disabling access to the URL by the user; and,

invoking the URL with a browser to thereby enable the user to redeem the coupon.

25. The method of claim 24 wherein said invoking step includes the substep of selecting the coupon by one of clicking on the displayed coupon and clicking on an object different than the coupon displayed to the user.

26. A method of operating an electronic coupon distribution system comprising the steps of:

collecting device information from a device of a client system without obtaining information sufficient to specifically identify the user;

associating a device ID with the device information at a main server system;

selecting a coupon according to the device ID to thereby identify the coupon appropriate for said user based on the device

information; and,

transmitting the selected coupon from the main server system to the client system.

27. The method of claim 26 wherein said collecting step comprises the substep of:

obtaining from the remote user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

28. The method of claim 26 further including the step of:

associating the device ID with a remote client system.

29. The method of claim 28 further including the step of:

generating a printed version of one of the transmitted coupons at the remote client system that includes the device ID.

30. The method of claim 28 further including the step of:

transmitting a request from the client system to the server system to perform said selecting step wherein the request includes the device ID.

31. The method of claim 30 wherein said request transmitting step includes the substep of:

automatically including the device ID in the request without

any intervention by the remote user of the client system.

32. The method of claim 30 wherein said request transmitting step occurs automatically without any intervention by the remote user.

33. The method of claim 32 wherein said request transmitting step occurs at predetermined intervals.

34. The method of claim 28 wherein the remote client system operates in accordance with an operating system characterized by a graphical user interface (GUI), said method further including the steps of:

displaying an icon visible to the user in a first display state; and,

displaying the icon in a second display state different from the first display state when new coupon are available for the user.

35. The method of claim 34 wherein the second display state is a flashing display state.

36. The method of claim 28 wherein said transmitting step includes the substeps of:

encrypting coupon data corresponding to the selected coupons

at the server system in accordance with a server system encryption strategy; and,

sending the server-encrypted coupon data to the client system.

37. The method of claim 36 further including the step of:

receiving the server-encrypted coupon data at the client system;

encrypting the server-encrypted coupon data in accordance with a client system encryption strategy to thereby generate doubly-encrypted coupon data; and,

storing the doubly-encrypted coupon data on the client system.

38. The method of claim 37 further including the steps of:

decrypting the doubly-encrypted coupon data at the client system; and,

generating a printed version of one of the selected coupons at the remote client system.

39. The method of claim 28 further comprising the steps of:

transmitting advertising data to the client system; and,

displaying at least a portion of the transmitted advertising data on a display portion of the remote client system.

40. The method of claim 39 wherein the advertising data comprises a plurality of advertising impressions, and, wherein said displaying step comprises the substep of:

selecting one of the plurality of advertising impressions as a function of a selected subcategory of coupons available on the remote client system.

41. The method of claim 28 further comprising the steps of:

detecting events occurring at the remote client system;

storing the detected events in a user history file; and,

transmitting the user history file to the server system.

42. The method of claim 41 wherein said detecting step includes the substeps of:

determining when one of a plurality of advertising impressions has been displayed on a display portion of the remote client system; and,

determining a sponsor identification of the advertising impression.

43. The method of claim 41 wherein the storing step comprises the substep of:

encrypting the detected events to thereby generate encrypted user event information; and,

writing the encrypted user event information to the client

system.

44. A coupon distribution system, comprising:

means for collecting device information from a user of a remote client system indicative of one or more demographic characteristics of the user without obtaining information sufficient to specifically identify the user;

means for associating a device ID with the device information at a main server system;

means for selecting coupons according to the device ID to thereby identify coupons appropriate for the user based on the user's demographic characteristics; and,

means for transmitting the selected coupons from the server system to the client system.

45. The system of claim 44 wherein said collecting means includes means for obtaining from the remote user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

46. The system of claim 45 further including means for associating the device ID with the remote client system.